

EXHIBIT B

-TO-

**PROTECTIVE LIFE INSURANCE COMPANY'S
EMERGENCY MOTION TO INTERVENE TO SUE
RECEIVER AND TO STAY RULING ON
RECEIVER'S MOTION TO APPROVE INITIAL
PLAN OF DISTRIBUTION (DOC. 114) AND
MEMORANDUM OF LAW IN SUPPORT
THEREOF**

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AUBREY LEE PRICE; et al

Defendants,

PROTECTIVE LIFE INSURANCE
COMPANY

Intervention Plaintiff,

v.

MELANIE E. DAMIAN,
in her capacity as Receiver,

Intervention Defendant.

Civil Action No.
1:12-cv-2296-TCB

AFFIDAVIT OF JOSIE WRIGHT

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

Personally appearing before me, the undersigned officer duly authorized to
administer oaths, is Josie Wright who, after being duly sworn, deposes and says:

1. My name is Josie Wright, and I am over eighteen (18) years of age and competent to make this affidavit. I have personal knowledge of the statements set forth herein and I make this affidavit for any lawful use or purpose.

2. At all times relevant hereto, I have been employed by Protective Life Insurance Company ("Protective") as Senior Customer Care Claims Specialist. In my capacity as Senior Customer Care Claims Specialist, I was responsible for overseeing determinations related to the payment of death benefits pursuant to Policy No. L26007137 ("Policy"), a life insurance policy insuring the life of Aubrey Lee Price ("Price").

3. On or around January 14, 2013, Melanie E. Damian, the court-appointed receiver ("Receiver") for Price's estate in *SEC v. Price*, et al, Case No. 1:12-CV-2296-TCB, filed a claim seeking payment of the proceeds of the Policy. Specifically, on January 14, 2013, the Receiver notified Protective that she was making a claim on the Policy and submitted the Order Granting Petition for Presumptive Death Certificate. On March 14, 2013, the Receiver completed a Claimant's Statement for Death Benefit. On May 3, 2013, the Receiver submitted Price's Death Certificate.

4. Having received the Order Granting Petition for Presumptive Death Certificate, Price's Death Certificate, and the Claimant's Statement for Death Benefit, Protective issued a check to the Receiver in the amount of \$251,510.32

("Payment") on July 3, 2013. The Payment consisted of the policy proceeds of \$250,000.00, a premium refund of \$3.47, and interest of \$1506.85.

FURTHER AFFIANT SAYETH NOT.

Josie Wright
Josie Wright, Affiant

Sworn to and subscribed before me this 21st day of January, 2014.

Julie Duncan
Notary Public

My Commission Expires: July 23, 2014

7-23-2014